

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
ELKINS**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**CRIMINAL NO.: 2:20-CR-13
(Judge Kleeh)**

**WILLIAM JOHN CLARK,
Defendant.**

**SUPPLEMENT TO DEFENDANT'S MOTION FOR
COMPASSIONATE RELEASE PENDING TRIAL**

Comes now the Defendant, William John Clark, by and through his counsel, Thomas G. Dyer, and respectfully requests this honorable Court to consider the additional information attached hereto, being specifically an updated report respecting the presence of COVID-19 cases in the inmate population throughout the State of West Virginia. Most importantly, it should be noted that presently there is 1 positive (active case) at the Tygart Valley Regional Jail where the defendant is located; 22 cases pending the return of test results; and, 214 inmates presently in quarantine at that facility. This information represents a material change in the circumstances from April 10, 2020, the date on which this Court denied the defendant's earlier *Motion to Review Order Granting Detention*, as there were no reported cases at this particular jail facility on that date.

Counsel continues to contend that given the defendant's current medical status, fashioning a set of conditions that would assure the safety of the community as well as the defendant's return for further court proceedings is something that is clearly achievable.

WHEREFORE, and in consideration of all of the foregoing, the Defendant respectfully requests that the original order for detention in this matter be revised so as to permit his immediate release.

Respectfully submitted,
Defendant
By counsel

/s/ Thomas G. Dyer
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CERTIFICATE OF SERVICE

I, Thomas G. Dyer, counsel for the defendant, hereby certify that on the 12th day of June, 2020, I electronically filed the foregoing *Supplement to Defendant's Motion For Compassionate Release Pending Trial*, with the Clerk of the Court using the CM/ECF system.

/s/ Thomas G. Dyer
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